

MEMO ENDORSEDUNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

DAVID CLARK COMPANY)
INCORPORATED)
Plaintiff,) CIVIL ACTION NO. 1:23-CV-01233
v.)
ROANWELL LLC,)
Defendant.)

AGREEMENT FOR JUDGMENT

Plaintiff David Clark Company Incorporated and defendant Roanwell LLC, hereby agree that the Court should enter the following final judgment in the above-captioned action:

1. Defendant Roanwell LLC is hereby permanently enjoined worldwide from the manufacture, importation, promotion, marketing, offer for sale, or sale of any communication headset with headset domes that include the color of the David Clark headset at issue in this action (two photographs of which are reproduced below) or any color that is confusingly similar to the color of the headset domes of the David Clark headset:



2. This judgment will be binding on Roanwell LLC as well as all of its successors, assigns, parents, subsidiaries, divisions and affiliated companies and/or partnerships, directors, officers, shareholders, employees, agents, representatives, and attorneys.

Respectfully submitted,

DAVID CLARK COMPANY INCORPORATED

By its attorneys,

/s/ Theodore Hawkins

OLSHAN FROME WOLOSKY LLP
Theodore J. Hawkins
1325 Avenue of the Americas
New York, New York 10019
(212) 451-2300

/s/ William Hilton

GESMER UPDEGROVE LLP
William E. Hilton - Admitted Pro Hac Vice
william.hilton@gesmer.com
Michael D. Brier - Admitted Pro Hac Vice
michael.brier@gesmer.com
40 Broad Street
Boston, MA 02109
(617) 350-6800

ROANWELL, LLC

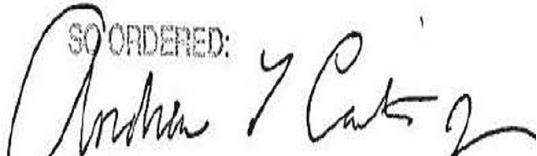
/s/ Neal Cohen

Neal W. Cohen
ncohen@halperinlaw.net
Halperin Battaglia Benzija, LLP
40 Wall Street, 37th Floor
New York, NY 10005
Telephone: 212-765-9100

/s/ David G. Hanson

David G. Hanson (*Pro Hac Vice*)
WI State Bar ID No. 1019486
dhanson@reinhartlaw.com
Elizabeth Elving (*Pro Hac Vice*)
WI State Bar ID No. 1115903
eelving@reinhartlaw.com
Reinhart Boerner Van Deuren s.c.
1000 North Water Street, Suite 1700
Milwaukee, WI 53202
Telephone: 414-298-1000
Facsimile: 414-298-8097

Feb. 12, 2024


SO ORDERED:
Andrew L. Carter, Jr.
HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Page 2

Dated: March 7, 2024